

Jon

CPS Chemical - EPA I.D. No. NJ0002141190

Thomas Solecki, Environmental Engineer
New Jersey/Caribbean Compliance & Enforcement Section (2AMF-SW)

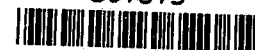
File

The review of CPS Chemical's closure plan/cost estimate is being terminated.

Remaining discrepancies are being handled by the state thru a Part B
review/NOD.

07/21/1990

507573



PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for services requested.

1. ☒ *Postage and fee paid*
2. ☐ *Registered Mail*

Mr. John A. Rowe
Operations Manager
CPS Chemical Company, Inc.
P.O. Box 162
Old Bridge, New Jersey 08857

☒ Certified ☐ COD
☐ Express Mail

P468469065

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X

6. Signature - Agent
X *John A. Rowe*

7. Date of Delivery
OCT 18 1985

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT



Please print or type in areas are spaced for elite type, 10/18 (10/18 per inch).

No. 158-R0175

U.S. ENVIRONMENTAL PROTECTION AGENCY

EPA I.D. NUMBER

NJD002141130

FORM
GENERAL



GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

GENERAL INSTRUCTIONS

If a preprinted label has been provided, fill it in the designated space. Review the information carefully; if any of it is incorrect, or through it and enter the correct data in the appropriate fill-in area below. Also, if any the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete items II, IV, VII, VIII, and IX if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

I. EPA I.D. NUMBER

NJD002141130

III. FACILITY NAME

CPS Chemical Company, Inc.

V. MAILING ADDRESS

PO BOX 162

OLD BRIDGE, NJ 08852

VI. FACILITY LOCATION

OLD WATERWORKS RD

OLD BRIDGE, NJ 08852

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column. If the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X"			SPECIFIC QUESTIONS	MARK "X"		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

CPS CHEMICAL CO. INC.

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)

B. PHONE (area code & no.)

W. E. SISCO V.P.

201 727 3100

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

P.O. BOX 162

B. CITY OR TOWN

C. STATE

D. ZIP CODE

OLD BRIDGE

NJ

08852

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

OLD WATERWORKS ROAD

B. COUNTY NAME

MIDDLESEX

D. STATE E. ZIP CODE F. COUNTY NAME

ES (4-digit, in order of priority)

A. FIRST

B. SECOND

9 (specify)	Industrial Organic Chemicals	7	(specify)
C. THIRD	(specify)	7	(specify)

OR INFORMATION

A. NAME

B. Is the name listed in Item VIII-A also the owner?

☒ YES ☐ NO

CHEMICAL CO. INC.

TUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

D. PHONE (area code & no.)

AL	M = PUBLIC (other than federal or state)	P	(specify)	C	A	201	727	3100
TE	O = OTHER (specify)							

E. STREET OR P.O. BOX

O.X. 162

F. CITY OR TOWN

G. STATE

H. ZIP CODE

IX. INDIAN LAND

Is the facility located on Indian lands?

☐ YES ☒ NO

BRIDGE

NJ

08857

ENVIRONMENTAL PERMITS

ES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 P	
Underground Injection of Fluids	E. OTHER (specify)
9	see attached
RCRA (Hazardous Wastes)	F. OTHER (specify)
9	042279

NTDEP

this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface as in the map area. See instructions for precise requirements.

F9: 1/50

OF BUSINESS (provide a brief description)

Chemical Co. manufactures specialty organic chemicals which are used in the production and sewerage treating agents, lubricants, oil field chemicals, and anticorrosion agents find direct use as plasticizers.

Also a distributor of commodity and specialty chemicals manufactured by other major chemical s. Most of the chemicals distributed by CPS are picked up at the producers plant or and delivered directly to the customer without passing through the CPS plant.

ion CPS recovers solvents and off grade chemicals for reuse by its customers. These and chemicals may be either hazardous or non-hazardous.

F9: A
51

ICATION (see instructions)

nder penalty of law that I have personally examined and am familiar with the information submitted in this application and all ts and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the 7, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting nation, including the possibility of fine and imprisonment.

OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
SISCO, Y.P.	W.C. Smith	11/11/80

FOR OFFICIAL USE ONLY

OFFICIAL USE ONLY
LOCATION PROVED DATE RECEIVED (yr., mo., & day)
801119
COMMENTS

FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's I.D. Number in Item I above.

FIRST APPLICATION (place an "X" below and provide the appropriate date)
1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)
2. NEW FACILITY (Complete item below.)
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)
68 12 01
FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

REVISED APPLICATION (place an "X" below and complete Item I above)
1. FACILITY HAS INTERIM STATUS
2. FACILITY HAS A RCRA PERMIT

PROCESSES - CODES AND DESIGN CAPACITIES

PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.
1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO-CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
ANK	S02	GALLONS OR LITERS		T02	GALLONS PER DAY OR LITERS PER DAY
ASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT		
	S04	GALLONS OR LITERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
Disposal:				T04	GALLONS PER DAY OR LITERS PER DAY
JECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
AND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
	D83	GALLONS OR LITERS			
SURFACE IMPOUNDMENT					
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	G
GALLONS PER DAY	U	LITERS PER HOUR	H		

SAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP
12 14 15

A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	A. PRO-CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY
1 S 0 2	600	G	5		
2 T 0 3	20	E	6		
S 0 2	See Attached 70000000	G	7		
S 0 1	See Attached 17,500000	G	8		
			9		

DESCRIPTION OF HAZARDOUS WASTES

HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If a facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESS CODES:
For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:
Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
			1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
K 0 5 4	900	P	T 0 3 D 8 0	
D 0 0 2	400	P	T 0 3 D 8 0	
D 0 0 1	100			

F6: $\frac{A}{55}$ F6: $\frac{A}{56}$

EPA I.D. NO. (enter from page 1)

N J D 0 0 2 1 4 1 1 9 0 3 6

FACILITY DRAWING

existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

PHOTOGRAPHS

existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

II. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4 0 2 6 0 2 0

LONGITUDE (degrees, minutes, & seconds)

0 7 4 1 9 3 3 0

III. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

CPS Chemical Co., Inc.

2. PHONE NO. (area code & no.)

2 0 1 - 7 2 7 - 3 1 0 0

3. STREET OR P.O. BOX

P. O. Box 162

4. CITY OR TOWN

Old Bridge

5. ST.

N J

6. ZIP CODE

0 8 8 5 7

X. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

W. E. Sisco

B. SIGNATURE

W. E. Sisco

C. DATE SIGNED

11/11/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

PERMITS

All storage tanks have permits issued by the New Jersey Department of Environmental Protection. Numbers are listed below:

042279
042277
042276
042275
042274
042272
042278
042273
001860
042310
042311
042312
042313
000735
000734
000733
000732
001860
001861
001862
46283

III.

- C-1 Tankage is available for the storage of raw materials and finished products as well as for solvent streams and off grade chemicals, which are intended for recovery and recycle. These solvents may or may not be classified as hazardous wastes.

Total tankage available for these purposes is 700,000 gallons. Storage utilized for hazardous materials will vary according to demand.

- C-2 Hazardous waste generated at CPS is accumulated in drums and stored in a designated area (see map) within the diked and paved section of the plant until it can be removed to an approved landfill facility. The area currently assigned for this purpose is 130' x 50' and will provide for the storage of approximately 80,000 gallons of waste. Estimated annual generation of this waste is 17,500 gallons based on current level of plant operation.

- C-3 Some spent solvents are upgraded to reusable quality by distillation. Some of these are in the hazardous category.

It is our understanding that this activity will not be regulated at this time and that design capacity is not required at this time.

Review 4/1/85

2000-0356
9/30/83

CLOSURE AND POST-CLOSURE COMPLIANCE REVIEW CHECKLIST

I. GENERAL FACILITY INFORMATION

EPA ID # NJD 002 14119

Address PO Box 162
OLD BRIDGE, N.J. 08851

Owner _____
(name and phone number)

Operator _____
(name and phone number)

Name of Facility CPS Chemical Company

Date & Time of Inspection N/A

Personnel Present _____

Notes:

J. A. Rowe, Jr
201-727-3100

Type of Facility (check all that apply/fill-in blanks)

☐* ✓ Storage ✓ Treatment Disposal

	<u>Active</u>	<u>Inactive</u>	<u>Planned</u>
<input checked="" type="checkbox"/> <u>✓</u> Containers	<u>1000 TON TANKS</u> (number and volume)		
<input checked="" type="checkbox"/> <u>✓</u> Tanks	<u>300 gal hA2.</u> (number and volume)		
<input type="checkbox"/> _____ Piles	_____ (number and volume)		
<input type="checkbox"/> _____ Incinerator	_____ (gallons or tons per hour)		
<input type="checkbox"/> _____ Landfill	_____ (acres and volume)		
<input type="checkbox"/> _____ Land Treatment	_____ (acres and volume)		
<input type="checkbox"/> _____ Surface Impoundment	_____ (acres and volume)		
<input type="checkbox"/> _____ Chemical/Physical/ Biological Treatment	_____ (gallons or tons per hour)		
<input type="checkbox"/> _____ Thermal Treatment	_____ (gallons or tons per hour)		
<input type="checkbox"/> _____ Underground Injection	_____ (nominal operating rate)		

Describe tank and container conditions (e.g., age, remaining surface life, etc.) in Comments section.

*Checkboxes indicate items to be reviewed during on-site visit.

II. WRITTEN PLAN

- | | | | | |
|---|---|-----|----|-----|
| ★ | 1. Is there a WRITTEN CLOSURE PLAN kept at the facility? (40 CFR 265.112(a)) | YES | NO | |
| | 2. Does the closure plan cover all areas and facilities that were ACTIVE as of 11/19/80? | YES | NO | |
| | 3. Does the closure plan include <u>general information</u> about the facility which would be helpful in reviewing the plan, including: | | | |
| | a. facility size(s) | YES | NO | |
| | b. facility type(s) | YES | NO | |
| | c. descriptions of all on-site equipment | YES | NO | |
| | d. topography | YES | NO | |
| | e. waste characterization | YES | NO | |
| | f. soil type | YES | NO | |
| | g. description of surrounding land use | YES | NO | |
| | h. surrounding population | YES | NO | |
| | i. size of facility (acres) | YES | NO | |
| | j. volume of impoundment | YES | NO | N/A |
| | k. type(s) of treatment/processing | YES | NO | N/A |
| | l. description of liner | YES | NO | N/A |
| | m. leachate collection system | YES | NO | N/A |
| | n. gas collection system | YES | NO | N/A |
| | o. dredging procedures/schedules, etc. | YES | NO | N/A |
| | p. incinerator specifications | YES | NO | N/A |
| | q. other (specify _____) | YES | NO | |

III. MAXIMUM EXTENT OF OPERATION

- | | | | | |
|---|--|-----|----|-----|
| ★ | 1. Does the plan identify the MAXIMUM EXTENT OF OPERATION which will be unclosed during the life of the facility? (40 CFR 265.112(a)(1)) | YES | NO | |
| □ | 2. Is the MAXIMUM EXTENT OF OPERATION estimate exceeded by current operations? | YES | NO | |
| □ | 3. Does the MAXIMUM EXTENT OF OPERATION estimate include: | | | |
| | a. the maximum area of landfill or land treatment ever containing wastes? | YES | NO | N/A |
| | b. inactive areas open because of operating problems or contingencies? | YES | NO | N/A |
| | c. maximum area of land ever used for land spreading? | YES | NO | N/A |

- | | | | | |
|----|---|-----|----|-----|
| d. | the most extensive treatment required for land spreading? | YES | NO | N/A |
| e. | the maximum area used for storage? | YES | NO | N/A |

Explain each "NO" answer in comment section.

IV. PARTIAL CLOSURE



1. Does the plan identify the steps for PARTIAL CLOSURE, at any time during the intended operating life, of

- | | | | | |
|----|---|-----|----|-----|
| a. | surface impoundments? | YES | NO | N/A |
| b. | landfills? | YES | NO | N/A |
| c. | tanks? | YES | NO | N/A |
| d. | other (specify: _____)
(40 CFR 265.112(a)) | YES | NO | |

IF NO PARTIAL CLOSURE PLAN, CIRCLE N/A AND SKIP TO SECTION V.

2. Does the PARTIAL CLOSURE plan identify

- | | | | | |
|----|-------------------------------------|-----|----|-----|
| a. | the size of areas partially closed? | YES | NO | N/A |
| b. | procedures for partial closure? | YES | NO | |
| c. | maintenance program? | YES | NO | |
| d. | frequency of partial closures? | YES | NO | |
| e. | source of cover materials? | YES | NO | N/A |

- 3. Does the plan for PARTIAL CLOSURE demonstrate the adequacy of the cap, etc. to meet the closure requirements?
- | | |
|-----|----|
| YES | NO |
|-----|----|

OR

Are these areas or activities otherwise included in the extent of operations of the closure plan?	YES	NO
---	-----	----

4. Does the PARTIAL CLOSURE PLAN describe maintenance activities for partially closed areas, including:

- | | | | | |
|----|-----------------------------------|-----|----|-----|
| a. | visual inspections? | YES | NO | N/A |
| b. | ground-water monitoring? | YES | NO | N/A |
| c. | maintaining cover? | YES | NO | N/A |
| d. | maintaining diversion structures? | YES | NO | N/A |
| e. | controlling erosion? | YES | NO | N/A |
| f. | maintaining vegetation? | YES | NO | N/A |
| g. | security requirements? | YES | NO | N/A |
| h. | leachate collection? | YES | NO | N/A |
| i. | gas collection? | YES | NO | N/A |

5. Does the PARTIAL CLOSURE PLAN describe maintenance frequencies for partially closed areas, including:

a. visual inspections?	YES	NO	N/A
b. groundwater monitoring?	YES	NO	N/A
c. maintaining the cover?	YES	NO	N/A
d. maintaining diversion structures?	YES	NO	N/A
e. controlling erosion?	YES	NO	N/A
f. maintaining vegetation?	YES	NO	N/A
g. security requirements?	YES	NO	N/A
h. leachate collection?	YES	NO	N/A
i. gas collection?	YES	NO	N/A

6. Is there a SCHEDULE FOR PARTIAL CLOSURE?
If "NO" SKIP TO SECTION V.

YES NO

7. Does the SCHEDULE FOR PARTIAL CLOSURE include:

★ a. date(s) of partial closure(s)? (40 CFR 265.112(a)(1))	YES	NO	
b. total time required for each partial closure?	YES	NO	
c. time required for key steps--			
i. waste removal?	YES	NO	N/A
ii. waste stabilization?	YES	NO	N/A
iii. waste treatment?	YES	NO	N/A
iv. waste disposal?	YES	NO	N/A
v. placement of cover?	YES	NO	N/A
vi. vegetation?	YES	NO	N/A
vii. decontamination?	YES	NO	N/A
viii. other (specify: _____)	YES	NO	N/A

V. MAXIMUM INVENTORY



1. Is there an estimate of the MAXIMUM INVENTORY of wastes in storage or treatment at any time during the life of the facility? (40 CFR 265.112(a)(2))

(YES) NO N/A

BUT NOT ACCURATE
DISAGREES WITH PART A
PART A - 17,500 g
CLOSURE - PLAN 55,000 g

□ 2. Does the MAXIMUM INVENTORY estimate include the maximum amount of on-site wastes:

a. requiring pre-treatment?
b. requiring treatment? UNKNOWN
c. requiring disposal?

YES	NO	(N/A)
YES	NO	N/A
(YES)	NO	N/A

3. Does the MAXIMUM INVENTORY estimate include the maximum amount of on-site:
- | | | | | | |
|--------------------------|----|---|-----|----|-----|
| <input type="checkbox"/> | a. | wastes in surface impoundments? | YES | NO | N/A |
| <input type="checkbox"/> | b. | wastes in partially-closed non-disposal surface impoundments? | YES | NO | N/A |
| <input type="checkbox"/> | c. | wastes in tanks? | YES | NO | N/A |
| <input type="checkbox"/> | d. | wastes in piles? | YES | NO | N/A |
| <input type="checkbox"/> | e. | wastes in drainage pits? | YES | NO | N/A |
| <input type="checkbox"/> | f. | wastes in containers? | YES | NO | N/A |
| <input type="checkbox"/> | g. | standing liquids? | YES | NO | N/A |
| <input type="checkbox"/> | h. | sludge? | YES | NO | N/A |
| <input type="checkbox"/> | i. | contaminated soil from land treatment fields? | YES | NO | N/A |
| <input type="checkbox"/> | j. | contaminated soil and liners from non-disposal impoundments? | YES | NO | N/A |
| <input type="checkbox"/> | k. | contaminated soil from around tanks, containers, piles? | YES | NO | N/A |
| <input type="checkbox"/> | l. | process residues? | YES | NO | N/A |
| <input type="checkbox"/> | m. | decontamination residues? | YES | NO | N/A |
4. Does the plan discuss the type(s) of TESTING AND CRITERIA to be used to determine:
- | | | | | |
|----|---|-----|----|-----|
| a. | whether soil is contaminated? | YES | NO | N/A |
| b. | whether decontamination residues are hazardous? | YES | NO | N/A |
| c. | whether process residues are hazardous? | YES | NO | N/A |
- RESIDUES ASSUMED HAZARDOUS. BUT NO QUANTITY.
5. Are INCOMPATIBLE WASTES identified and provisions described for keeping them separate during closure?
- | | | |
|-----|----|-----|
| YES | NO | N/A |
|-----|----|-----|

VI. FINAL CLOSURE

1. Does the plan clearly identify the STEPS TO CLOSE
- | | | | | |
|---|----|--|-----|----|
| ★ | a. | at any point during the intended operating life? (40 CFR 265.112(a)) | YES | NO |
| ★ | b. | at the end of the intended operating life? (40 CFR 265.112(a)) | YES | NO |

2. Do the STEPS TO CLOSE in the plan include:

- | | | | | | |
|---|----|---|--------------------------------------|-------------------------------------|-----|
| ★ | a. | removal of wastes? (40 CFR 265.113(a)) | <input checked="" type="radio"/> YES | NO | N/A |
| ★ | b. | treatment of wastes? (40 CFR 265.113(a)) | <input checked="" type="radio"/> YES | NO | N/A |
| ★ | c. | waste disposal? (40 CFR 265.113(a)) | <input checked="" type="radio"/> YES | NO | N/A |
| | d. | waste containment? | <input checked="" type="radio"/> YES | NO | N/A |
| ★ | e. | cover? (40 CFR 265.310(b)) | <input checked="" type="radio"/> YES | NO | N/A |
| ★ | f. | decontamination of equipment and structures? (40 CFR 265.112(a)(3)) | <input checked="" type="radio"/> YES | NO | N/A |
| | g. | groundwater monitoring? | YES | NO | N/A |
| ★ | h. | closure certification? (40 CFR 265.115) | YES | <input checked="" type="radio"/> NO | N/A |
| | i. | maintenance of leachate program? | YES | NO | N/A |
| | j. | maintenance of gas collection program? | YES | NO | N/A |
| | k. | security requirements? | YES | <input checked="" type="radio"/> NO | N/A |

□ 3. With respect to the REMOVAL, TREATMENT, OR DISPOSAL of waste, does the plan identify:

- | | | | | |
|----|---|-----|-------------------------------------|--------------------------------------|
| a. | the source and type of materials and equipment needed? | YES | <input checked="" type="radio"/> NO | |
| b. | the amount of labor required? | YES | <input checked="" type="radio"/> NO | |
| c. | the capacity, number, and location of trenches or cells needed? | YES | NO | <input checked="" type="radio"/> N/A |
| d. | the area required for landspreading? | YES | NO | <input checked="" type="radio"/> N/A |

□ 4. Does the plan describe the CONTAINMENT of waste, including:

- | | | | | | |
|---|------|--|-----|----|--------------------------------------|
| ★ | a. | placement of final cover:
(40 CFR 265.280(c)(2); 265.310(a)) | | | |
| ★ | i. | characteristics of cover?
(40 CFR 265.280(c)(2)(ii);
265.310(a)(5)) | YES | NO | <input checked="" type="radio"/> N/A |
| ★ | ii. | design of cover including
final surface contours?
(40 CFR 265.280(c)(2)(ii);
265.310(a)(5)) | YES | NO | <input checked="" type="radio"/> N/A |
| | iii. | installation procedures? | YES | NO | <input checked="" type="radio"/> N/A |
| ★ | b. | drainage and diversion structures?
(40 CFR 265.280(c)(3), (4)) | YES | NO | <input checked="" type="radio"/> N/A |

N/A

c. vegetation program:				
★	1. characteristics of vegetation? (40 CFR 265.280(c)(2)(ii); 265.310(a)(5))	YES	NO	N/A
	ii. soil preparation?	YES	NO	N/A
★	d. erosion control: (40 CFR 265.310(b)(3))			
	i. type of materials?	YES	NO	N/A
	ii. amount of materials?	YES	NO	N/A
★	e. For landfills, does the closure plan address the following objectives and indicate how they will be achieved? (40 CFR 265.310(b))			
	(1) Control of pollution migration from the facility via ground water, surface water, and air.	YES	NO	N/A
	(2) Control of surface water infil- tration, including prevention of pooling.	YES	NO	N/A
	(3) Prevention of erosion.	YES	NO	N/A
★	f. For land treatment operations, does the closure plan address the following objectives and indicate how they will be achieved? (40 CFR 265.280(a))			
	(1) Control of migration of hazardous wastes and constituents into ground water.	YES	NO	N/A
	(2) Control of the release of contami- nated run-off into surface water.	YES	NO	N/A
	(3) Control of the release of airborne particulate contaminants caused by wind erosion.	YES	NO	N/A
	(4) Protection of food chain crops.	YES	NO	N/A

- ★ g. For landfills and land treatment operations, does the closure plan include at least a narrative statement indicating that the following factors were considered in addressing the closure objectives? (40 CFR 265.280(b), 310(b))

N/A

(1) Type and amount of waste.	YES	NO	N/A
(2) Mobility and rate of migration.	YES	NO	N/A
(3) Site location, topography, and surrounding land use.	YES	NO	N/A
(4) Climate, including precipitation.	YES	NO	N/A
(5) Characteristics of the cover, including material, final surface contour, thickness, porosity, permeability, slope, vegetation.	YES	NO	N/A
(6) Geological and soil profiles and surface and subsurface hydrology.	YES	NO	N/A
(7) Unsaturated zone monitoring.	YES	NO	N/A
(8) Type, concentration, and depth of hazardous constituent migration as compared to background concentrations.	YES	NO	N/A

- ★ 5. Does the plan describe the DECONTAMINATION (40 CFR 265.112(a)(3); 265.114) of facility equipment and structures, including:

a. a list of equipment, containers, and structures requiring disposal or decontamination?	YES	<input checked="" type="radio"/> NO	N/A
b. decontamination procedures?	<input checked="" type="radio"/> YES	NO	N/A
c. method of treatment or disposal of residues?	<input checked="" type="radio"/> YES	NO	N/A
d. testing program?	YES	<input checked="" type="radio"/> NO	N/A

EQUIPMENT NOT ADDRESSED

- 6. With respect to MONITORING, does the closure plan describe:
- | | | | |
|--|-----|----|-----|
| a. details of the groundwater monitoring program during closure? | YES | NO | N/A |
| b. soil testing and monitoring | YES | NO | N/A |
| c. maintenance of monitoring equipment during closure? | YES | NO | N/A |
| d. other (specify: _____) | YES | NO | |
- ★ 7. With respect to CERTIFICATION of closure (40 CFR 265.115), does the closure plan describe scheduled or estimated number of inspections?
- YES NO
8. If a system for COLLECTING LEACHATE is present, does the closure plan:
- | | | | |
|--|-----|----|-----|
| a. describe leachate removal, treatment, and disposal during closure? | YES | NO | N/A |
| b. identify the approximate volume of leachate collected? | YES | NO | N/A |
| c. provide for maintenance of the leachate collection system during closure? | YES | NO | N/A |
- 9. If a GAS COLLECTION SYSTEM is required during operation, does the closure plan:
- | | | | |
|---|-----|----|-----|
| a. describe procedures for collecting gas during closure? | YES | NO | N/A |
| b. describe monitoring samples and analysis during closure? | YES | NO | N/A |
| c. maintenance of gas collection system during closure? | YES | NO | N/A |
- 10. If SECURITY (i.e., fencing) is required, does the closure plan:
- | | | | |
|--|-----|----|-----|
| a. describe the maintenance of security equipment during the closure period? | YES | NO | N/A |
| b. describe the installation of appropriate equipment at closure? | YES | NO | N/A |
| c. state the dimensions of the fence and the area to be enclosed? | YES | NO | N/A |

VII. FINAL CLOSURE: SCHEDULE

- ★ 1. Does the plan identify the YEAR when final closure is expected to occur? (40 CFR 265.112(a)(4)) YES ☒ NO ☐
- What is the expected year of closure? ?
- ★ 2. Is there a SCHEDULE for final closure activities? (40 CFR 265.112(a)(4)) ☒ YES ☐ NO
- IF "NO" SKIP TO COMMENTS SECTION.
3. Does the SCHEDULE for final closure include:
- ★ a. date closure is expected to begin? (40 CFR 265.112(a)(1)) ☒ YES ☐ NO
- ★ b. total time required to close? (40 CFR 265.112(a)(4)) ☒ YES ☐ NO
- ★ c. the time for intervening closure activities? (40 CFR 265.112(a)(4)) ☒ YES ☐ NO
- d. time required for key steps:
- ★ i. waste inventory treatment? (40 CFR 265.112(a)(4)) *UNKNOWN* YES ☐ NO ☐ N/A
- ★ ii. waste inventory disposal? (40 CFR 265.112(a)(4)) ☒ YES ☐ NO ☐ N/A
- iii. removal of waste inventory and residues? ☒ YES ☐ NO ☐ N/A
- iv. decontamination of facility equipment and structures? *EQUIPMENT NOT ADDRESSED* YES ☒ NO ☐ N/A
- v. install containment and diversion structures? YES ☐ NO ☒ N/A
- ★ vi. placement of final cover? (40 CFR 265.112(a)(4)) YES ☐ NO ☒ N/A
- vii. planting vegetation? YES ☐ NO ☒ N/A
- viii. closure certification? YES ☒ NO ☐
- ix. other (specify: _____) YES ☐ NO ☐
4. Does the SCHEDULE for final closure:
- ★ a. encompass more than 90 days for treatment, removal, or disposal of hazardous wastes after receipt of final volume of wastes? (40 CFR 265.113(a)) YES ☐ NO ☒



CPS CHEMICAL COMPANY, INC. P.O. BOX 182, OLD BRIDGE, N.J. 08857 • 201-727-3100

Subsidiaries: CPS CHEMICAL COMPANY • CPS CHEMICAL COMPANY OF ARKANSAS • CPS EXPORT, LTD. • CPS CHEMICALS CANADA

Telex 844532 • CPSOLDB

Angela
Tom
Solecki

July 16, 1985

Mr. Richard Walka
Chief, Solid Waste Branch
Air & Waste Management Division
26 Federal Plaza
New York, NY 10278

Subject: Your Letter of June 12, 1985 Requesting
Revised Closure Plan as Required under
N.J.A.C. 7:26-9.8 and 9.10.
EPA ID # NJD002141190

Dear Mr. Walka:

Your letter of June 12 was received at our office on June 18, 1985. I attempted to reach Mr. Thomas Solecki of your staff on June 20 by phone and was finally able to make contact on June 24.

At that time I explained that we were in the final stages of submitting our revised Part A under RCRA and our initial Part B to the NJDEP and that our deadline for this submission was July 17, 1985. The information requested in your letter has been developed in conjunction with these Part A and Part B submissions.

Specific answers to each item in your June 12 letter are as follows:

Facility Description

1. Description of container storage area including size, location and supporting surface material.

A plan drawing of our facility showing the area designated for container (drum) storage, its size and location, is enclosed. The supporting surface material is eight (8) inches of concrete covered by three (3) inches of asphalt. The entire plan area is protected from the surrounding area by an 8" asphalt berm (curb).

2. Description of tanks used for storage of hazardous waste including number, location (above or below ground) and capacity of each tank.

All tanks used in this service are welded, on quarter (1/4) inch thick carbon steel sides, bottom and deck.

The number and capacity of the tanks is excerpted from that portion of the Part B which deals with the same subject.

We have no below ground tanks at this facility. All storage tanks except those storing water are installed in fully concreted containment areas with concrete berms to a height of four (4) feet.

3. Certification of closure.

A certification to the effect that an outside professional engineering firm will oversee the closure plan and operation is attached.

4. Estimate of the year of closure.

The plant equipment is modern and is maintained in excellent condition. Therefore, we would not anticipate a year of closure prior to 2025.

5. Inventory of auxiliary equipment.

There is no equipment of this description as I understand the term according to my discussions with Mr. Solecki.

Removing All Inventory/Waste

1. Estimate of the amount of contaminated soil, if applicable.

The entire work area (four and one-half (4½) acres) is protected by eight inches of concrete, overlaid by three (3) to five (5) inches of asphalt. Therefore, there is an effective barrier to prevent contamination.

2. Estimate of contaminated rinse water.

Not applicable. Rinse waste with trace quantities of organics, would be stripped to minimum organic levels and would then be discharged to the Industrial sewer for ultimate treatment at the POTW.

3. Container storage - discrepancy between November 11, 1980 Part A and most recent closure plan.

The current level of hazardous waste drums stored in the designated area is approximately 1,000, which represents 50,000 gallons. Of this total it is estimated that 500, representing 25,000 gallons, will be pumped to waste fuel for ultimate incineration. The remaining 500 will be landfilled in a timely fashion.

Decontaminating the Facility

1. Rationale for assuming container storage area will not need decontamination.

As explained above, the complete work site, including the container storage area, is situated on eight (8) inches of concrete overlaid with three (3) or more inches of asphalt. Drums are inspected daily and leaks or spills cleaned up immediately. Thus, there is no reason to anticipate that a decontamination program will be required.

2. Procedures/parameters for decontaminating container storage area.

Based on the response to 1. above, this is felt to be not applicable.

3. Methods, parameters and rationale for determining if soil contamination exists.

As a result of sampling of monitoring wells in the surrounding area, it was determined by the NJDEP that some aquifer contamination has occurred. The time interval for this contamination probably dates back to at least the early 1970's. Current results indicate that the CPS site is clean and that a relatively small and shallow plume of organic contamination of unknown origin is present several hundred yards down gradient. A consent order for a remedial program to restore the aquifer to its normal level of purity is imminent,

There is no evidence that any contamination continues to be present or that supplemental removal procedures other than those which will result from the consent order will be required.

4. Procedures/parameters for decontamination of auxiliary equipment.

Not applicable.

Cost Estimate

1. Administrative cost.

Not applicable.

2. Contractor cost.

Not required except as noted in Closure Plan.

3. Contaminated soil sampling, analysis, removal and disposal.

None anticipated other than that noted under "Decontaminating the Facility."

4. Auxiliary equipment.

Not applicable.

5. Disposal of contaminated rinse water.

Addressed under "Removing of all Inventory/Waste.

6. Professional engineer's certification.

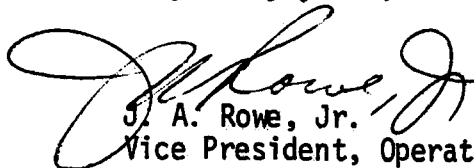
Although not specifically designated, one of several Engineering firms which we employ would be qualified to furnish this certification. The cost should be nominal, as the total closure should prove to be a routine procedure.

7. Contingency cost.

This was not specifically addressed as the current Cost Estimate is felt to be on the high side in view of the currently diminishing hazardous drum waste inventory.

Please advise if additional information is required.

Very truly yours,



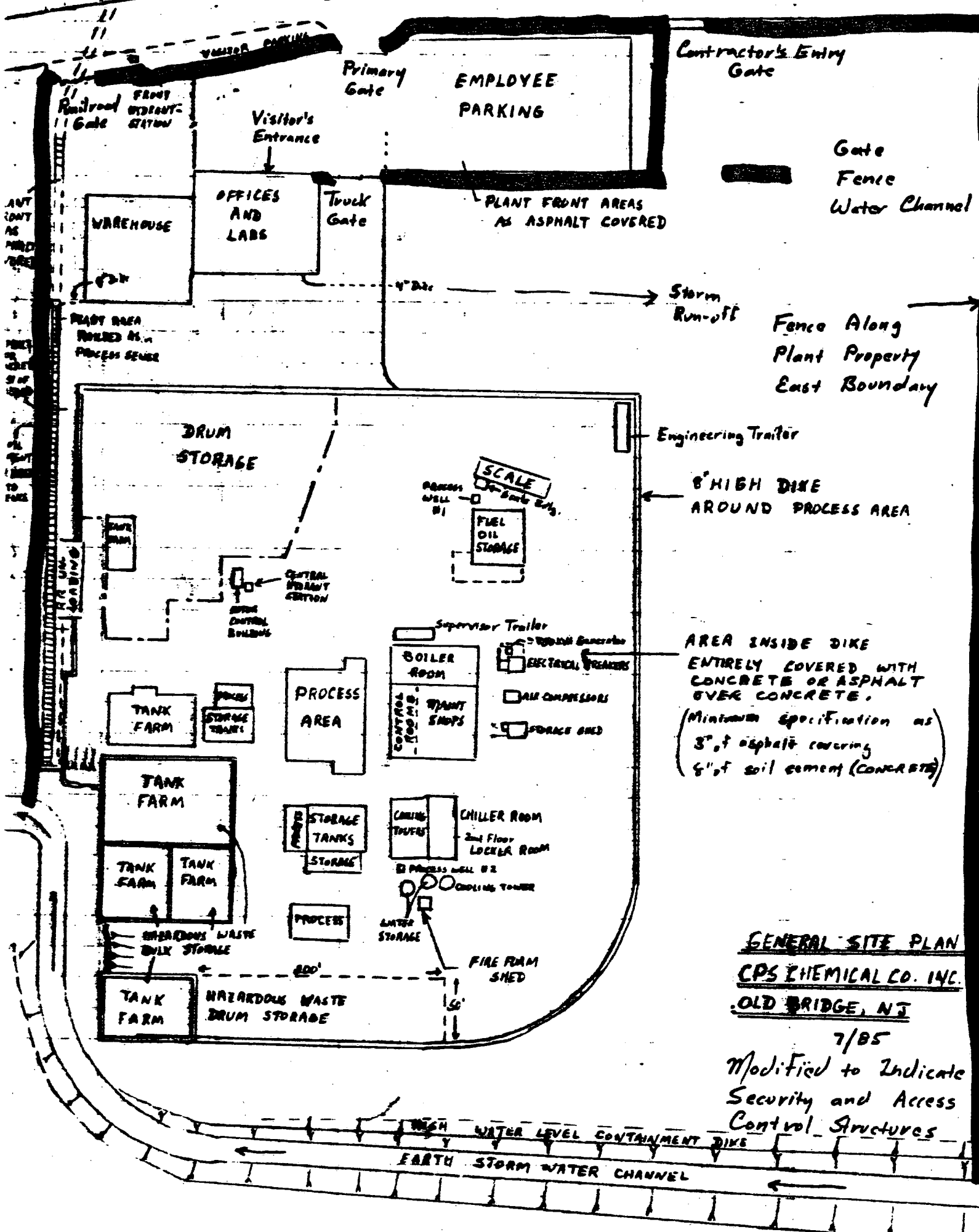
J. A. Rowe, Jr.
Vice President, Operations

JAR/cy

Encl.

cc: Mr. Richard A. Baker, USEPA
Mr. Joseph Rogalski, NJDEP
Mr. Frank Coolick, NJDEP

OLD WATERWORKS ROAD



AREA INSIDE DIKE
ENTIRELY COVERED WITH
CONCRETE OR ASPHALT
OVER CONCRETE.
(Minimum specification as
3" of asphalt covering
6" of soil cement (CONCRETE))

GENERAL SITE PLAN
CPS CHEMICAL CO. INC.
OLD BRIDGE, N.J.

7/85
Modified to Indicate
Security and Access
Control Structures

SCALE 1" = 100'

GENERAL WASTE HANDLING EQUIPMENT DATA

STORAGE TANKS

No.	Capacity (gal.)	Dimensions Dia. x Ht.	Material of Construction	Wall Thickness	Top	Bottom	Vert. or Horizontal
4 5 6	20,000	10'6" x 32'5½"	Carbon Steel	1/4"	Coned	Flat	V
13 14 16 18	10,000	10'6" x 17'0"	Carbon Steel	1/4"	Coned	Flat	V
30 32	5,000	8' x 13'10"	Carbon Steel	1/4"	Coned	Flat	V
39	35,000	14' x 31'5"	Carbon Steel	1/4"	Coned	Flat	V
311	7,583	12'2" x 8'7"	Carbon Steel	1/4"	Flat	Coned*	V
R-3	20,000	12'0" x 23'0"	Carbon Steel	3/8"	Dished	Dished	H

* With bottom-side mounted agitator

** Blueprint copies of all vessel except
Sketches of these vessels are attached.

311 are attached.

60
70
15
35
110
20
130
137,000



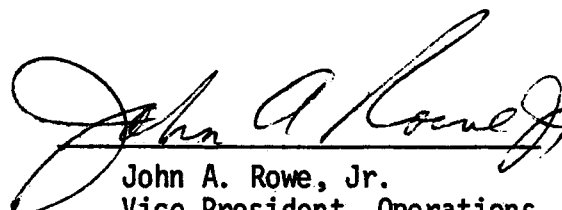
CPS CHEMICAL COMPANY, INC. P.O. BOX 102, OLD BRIDGE, N.J. 08857 • 201-727-3100

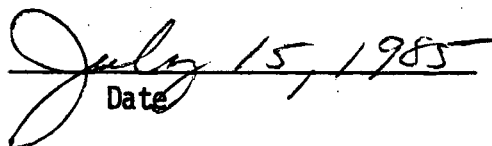
Subsidiaries: CPS CHEMICAL COMPANY • CPS CHEMICAL COMPANY OF ARKANSAS • CPS EXPORT, LTD. • CPS CHEMICALS CANADA

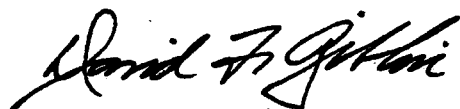
Telex 844532 • CPSOLDB

CERTIFICATION OF CLOSURE

The undersigned verifies that CPS Chemical Co., Inc. will employ an independent engineering firm to certify the closure of the subject facility at such time in the future as closure may occur. This independent firm will be qualified according to the laws of the State of New Jersey to certify the closure operation in accord with guidelines furnished by the USEPA and the NJDEP.


John A. Rowe, Jr.
Vice President, Operations


Date July 15, 1985


DAVID F. GIBLIN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires June 23, 1988
July 15, 1985



Mayer

CPS CHEMICAL COMPANY, INC. P.O. BOX 162, OLD BRIDGE, N.J. 08857 • 201-727-3100

Subsidiaries: CPS CHEMICAL COMPANY • CPS CHEMICAL COMPANY OF ARKANSAS • CPS EXPORT, LTD. • CPS CHEMICALS CANADA
Telex 844532 • CPSOLDB

February 22, 1985

Mr. Conrad Simon, Director
Air & Waste Management Division
United States Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Subject: Closure Plan and Costs per NJAC 7:26-9.8 and 9.10
in response to your letter of February 5, 1985

Dear Mr. Simon:

As requested by the subject letter and in accord with my phone conversation with Mr. Ton H. Moy of your staff on February 11, 1985, the subject closure plan and cost information is enclosed. Because we do not appear to fall under the categories covered by NJAC 7:26-9.9 and 9.11, this latter information has not been completed.

We have also signed and enclosed the Certification form, which was not received until February 19, 1985.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'J. A. Rowe, Jr.', with a large, stylized initial 'J'.

J. A. Rowe, Jr.

JAR/cy
Encl.

cc: Frank Coolick, NJDEP

FEB 19 1985

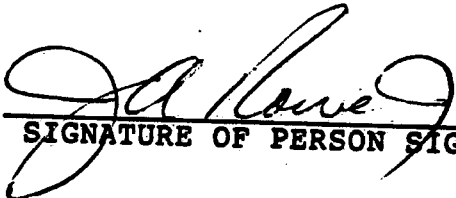
CERTIFICATION OF ANSWERS TO
REQUEST FOR INFORMATION

STATE OF NEW JERSEY)
COUNTY OF MIDDLESEX) ss.:

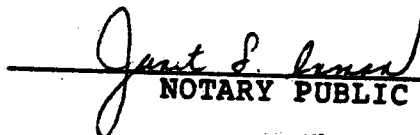
I certify that the foregoing answers to the EPA Request for Information are true, complete, and accurate to the best of my knowledge and belief and that any documents submitted herewith are complete and authentic to the best of my knowledge and belief.

J. A. ROWE, JR.
PRINTED NAME OF PERSON SIGNING

VICE PRESIDENT-OPERATIONS
TITLE


SIGNATURE OF PERSON SIGNING

Sworn to before me this 22nd day
of February, 1985.


NOTARY PUBLIC

JANET L. EGAN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Sept. 6, 1988

CPS CHEMICAL CO., INC.

NJAC 7:26-9.8 GENERAL CLOSURE REQUIREMENTS

Background Statement

The CPS Chemical Company is primarily a manufacturer of specialty organic chemicals used in water treatment. Some of the still residues generated in the manufacturing operation are hazardous wastes. CPS is a generator of hazardous wastes, primarily because these materials so generated are ignitable (D-001).

A secondary activity at CPS is the storage and recovery by distillation of certain solvents and chemicals, all of which have value, as is, and are further enhanced in value by such recovery. In each case the recovered, higher value material is returned to the customer and never discarded or treated as a waste.

CPS is not involved in the disposal of hazardous wastes at the Old Bridge site.

Hazardous wastes which are generated by the manufacturing processes are drummed as produced or stored in bulk tanks. These ignitable (D-001) wastes are stored in designated areas for subsequent off-site landfill disposal and/or incineration as waste fuel.

Closure of this part of the facility would occur only if the manufacture of products producing these wastes was discontinued. Closure then would consist of off-site landfill disposal of waste drums, and off-site incineration of bulk waste fuel followed by any necessary clean-up of the designated storage tanks and areas.

The recovery of solvents and chemicals at CPS utilizes excess distillation capacity not currently utilized for our manufacturing operations, which consist primarily of the production of water

treatment chemicals and intermediates. Closure of this part of the facility would result only in case of a decision by CPS management to utilize all existing capacity for captive production and to discontinue all recovery operations or if such recovery operations become uneconomical.

Closure in either case would consist of processing any remaining recovery materials or transfer of any remaining inventory to some alternate facility as directed by the supplier. All equipment and storage tanks would be decontaminated and cleaned to a condition suitable for other uses. The specific cleaning procedures will depend on the nature of the material last stored and will be developed as required.

RESPONSE TO SPECIFIC ITEMS IN NJAC 7:26-9.8

7:26-9.8

(e) 1. Closure Description

i. There is no intention, at the present time, to partially close the facility.

ii. As stated in the "Background Statement", the principal business of CPS Chemical is the manufacture of chemicals used for Water Treatment. There is no intention to close any portion of the Old Bridge operation at the present time.

2. Waste Inventory

Under normal operating conditions the drum waste for ultimate landfill disposal should not exceed 1,000 drums. It is our intention to gradually reduce this total by converting an increasingly higher percentage of ignitable waste to bulk liquids for incineration. This bulk liquid for incineration should not

exceed 30,000 gallons at any one time and will normally be less than 20,000 gallons.

3. Decontamination Steps

a. Drums. Full drums of solid non-pumpable waste will be landfilled. Drums containing pumpable liquid, if any, will be dedrugged into bulk tanks for incineration. Empty drums, if any, will be decontaminated by authorized rinsing procedures and salvaged as scrap steel. No decontamination of the drum storage area surface should be required.

b. Bulk Liquids. Ignitable waste tanks will be emptied by transferring the contents to designated approved incineration facilities. All such tanks will be solvent rinsed and the solvent made a portion of the bulk incineration load. Trace solvent remaining will be removed by steam cleaning until the tanks are rendered non-hazardous.

All other bulk tanks or processing equipment containing recovery crudes will be emptied by returning the contents to suppliers or to such other facilities as may be designated by the suppliers. Final decontamination will result from steam cleaning each item of bulk storage or processing equipment in accord with approved procedures.

4. Final Closure Schedule/Milestone Dates

If at some future time a decision is made to close the facility, the following plan, with milestone target dates would be anticipated.

a. Start (day zero). Discontinue processing operations including receipt of all raw materials and crudes being subjected to recovery process to enhance value.

WHERE

WASTE WATER
BULK
TANKS
Washing of

WHAT
Rinsing
Procedures

b. Drum disposition (per below, 42 days maximum).

(1) Maximum twelve (12) truckloads of solid residues at 2 truckloads per week. Total time 6 weeks or 42 days.

(2) Simultaneous dedrumming of pumpable liquids to bulk storage and decontamination of empty drums. Not to exceed 30 days within above 42 day period.

(3) Removal of all decontaminated drums to scrap steel yard. Not to exceed 30 days within above 42 day period.

c. Bulk Tank/Bulk Processing Equipment (49 days maximum).

(1) Simultaneous emptying of five (5) tanks containing a maximum of 30,000 gallons (6 x 5,000 gallon tank wagons) of waste fuel for incineration at a rate of two (2) tank wagons per week. Total three (3) weeks or 21 days.

(2) Simultaneous return to customers or alternate recovery facility of approximately nine (9) tanks containing a maximum of 105,000 gallons of recovery crudes for value enhancement. Estimate three (3) 5,000 gallon tank wagons per week, or a maximum of seven (7) weeks (49 total days simultaneous with drum removal).

(3) Processing equipment will be empty and non-operational during the drum and bulk tank emptying operation.

d. Decontamination of Bulk Storage and Bulk Processing Equipment (42 additional days).

Steam and/or solvent cleaning and related decontamination of all processing and storage equipment will commence as each piece of equipment is emptied. There is no reason to believe that this final cleaning procedure will consume more than an additional six (6) weeks (42 days) beyond the final removal of bulk liquids.

Thus the total final closure should be accomplished in a maximum of thirteen (13) weeks or 91 days from the start. In summary the milestones are:

- 42 days. Complete all drum removal.
- 49 total days. Complete all drum and bulk liquid removal
- 91 total days. Complete all decontamination of drum and bulk liquid storage areas and all bulk and processing equipment.

7:26-9.10 FACILITY CLOSURE FINANCIAL REQUIREMENTS

(e) Closure Cost Estimates

1. Current Estimate (2/22/85) - Maximum

a. Landfill Charges:

1,000 drums @ \$50.00/drum	50,000.00
Alabama State Tax \$2.00/drum	2,000.00
Freight \$2,200/load for 12 loads	<u>26,400.00</u>
Total landfill charges	\$78,400.00 ✓

b. Bulk Liquid Incineration Charges:

30,000 gallons waste fuel @ \$0.25/gal.	\$ 7,500.00
---	-------------

c. Storage Tank/Processing Equipment
Cleaning and Disposal:

Total fourteen (14) storage tanks, six (6)
processing vessels and auxiliary receivers.

Total estimated cost for solvent and/or
steam cleaning and removal of
solvent (estimate)

\$10,000.00

d. Freight to Return Recovery Crudes
to Source or to Alternate Recovery
Facility:

Twenty-one (21) 5,000 gallon tank
wagons at estimated average freight
charges of \$500.00 each

\$10,500.00

Total closure cost (estimate)

\$106,400.00

7:26-9.10 (f) FINANCIAL CLOSURE ASSURANCE

CPS Chemical has in effect, currently, a Surety Bond No. 80 98 77 32 from the Chubb Group of Insurance Companies. This Bond expires on February 26, 1985.

In the process of updating our Closure Cost information, we discussed the various financial assurance options available with Mr. Ali Chaudry of Mr. Frank Coolick's staff at the NJDEP Bureau of Hazardous Waste Engineering. As a result of that discussion, our assurance, effective February 26, 1985, will be a Trust Fund set up by National State Bank of Elizabeth, New Jersey.

12 JUN 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John A. Howe
Operations Manager
CPS Chemical Company, Inc.
P.O. Box 162
Old Bridge, New Jersey 08857

Dear Mr. Howe:

The U.S. Environmental Protection Agency (EPA) is charged with the responsibility for implementing the Solid Waste Disposal Act, as amended, 42 U.S.C. §6901 et seq. (the Act). [Note: Among the statutes amending the Act is the Resource Conservation and Recovery Act (RCRA), 90 Stat. 2795, P.L. 94580 (1976).] By notification, you informed EPA that you conduct activities at the above referenced facility involving "hazardous waste," as that term is defined in Section 1004(5) of the Act, 42 U.S.C. §6904(5), and in 40 CFR §261. As is required in Section 3005 of the Act, 42 U.S.C. §6925, and in 40 CFR §270, you requested a permit to conduct such hazardous waste activities.

Section 3006(6) of the Act, 42 U.S.C. §6926(6), provides that the Administrator of EPA may, if certain criteria are met, authorize a State to operate a hazardous waste program in lieu of the Federal program. The Administrator authorized the State of New Jersey to operate a program in lieu of the Federal program as of February 2, 1983.

Section 3008 of the Act, 42 U.S.C. §6928, authorizes EPA to enforce the provisions of the authorized State program.

In accordance with EPA's responsibility, a review of the required closure plan and cost estimate for the subject facility has been performed. EPA has determined that, based on the above referenced review, your facility is in violation of the New Jersey Solid Waste Management Act, N.J.S.A. 13:1E et seq., and the regulations promulgated thereunder. The following paragraphs indicate the regulatory provisions that have been violated:

N.J.A.C. 7:26-9.8 requires that the owner or operator of a hazardous waste facility must develop and maintain at the facility, a written closure plan which describes the steps necessary to close all or part of the facility. At the time of the review, the documents submitted are insufficient to meet the requirements of this section. A description of the deficiencies is enclosed. You are therefore in violation of N.J.A.C. 7:26-9.8.

N.J.A.C. 7:26-9.10 requires that the owner or operator of a hazardous waste facility must have at the facility a written estimate of the costs of closing the facility. At the time of the review, the documents submitted are insufficient to meet the requirements of this section. A description of the deficiencies is enclosed. You are therefore in violation of N.J.A.C. 7:26-9.10.

Section 3008 of the Act authorizes the assessment of a civil penalty of up to \$25,000 per day for violations of statutory provisions or relevant regulations. The determination of whether a penalty is to be imposed is based upon various factors, including the nature and seriousness of the violation and the good faith efforts to comply with the applicable requirements. It has been determined in this case that no penalty will be imposed for the violations cited above if the facility corrects all violations cited herein as expeditiously as possible and in no case later than 30 days from the receipt of this letter. Should the cited violations be discovered at this facility in the future, it is likely that an action for the assessment of a civil penalty will be initiated. Furthermore, please be advised that this letter in no way precludes future enforcement actions for any other violations discovered as a result of any other inspection.

Enclosed you will find a listing of additional information required to ensure proper closure and compliance with N.J.A.C. 7:26-9.8 and 7:26-9.10. Please submit, within 30 days of your receipt of this letter, a revised closure plan and any necessary support documents. This documentation should be addressed to:

Mr. Richard M. Walka
Chief, Solid Waste Branch
Air & Waste Management Division
26 Federal Plaza
New York, New York 10278

Also, please send a copy of this documentation to Richard A. Baker, Chief, Permits Administration Branch, at the same address. You must include your EPA identification number on all correspondence.

Should you have any questions about this notice or should you wish to discuss this matter further, please contact Thomas Solecki of my staff, at 212/264-5130.

Sincerely yours,

Richard M. Walka
Chief
Solid Waste Branch

Enclosure

cc: Joseph Rogalski, Assistant Director of Field Operations
Division of Waste Management, NJDEP (w/encl.)

bcc: Tom Solecki, SWB ✓
Stanley Siegel, SWB
Richard Baker, PAB
Tom Moy, SWB

CPS CHEMICAL COMPANY, INC.
EPA I.D. NO. NJD002141190

The following deficiencies and/or omissions have been noted in CPS Chemical Company, Inc.'s closure plan and closure cost estimate dated February 22, 1985:

FACILITY DESCRIPTION

- ° Description of container storage area including size, location and supporting surface material
- ° Description of tanks used for storage of hazardous waste including number, location (above or below ground) and capacity of each tank
- ° Certification of closure
- ° Estimate of the year of closure
- ° Inventory of auxiliary equipment

REMOVING ALL INVENTORY/WASTE

- ° Estimate of the amount of contaminated soil, if applicable
- ° Estimate of the amount of contaminated rinse water
- ° Container storage - Resolve discrepancy between Part A filed November 11, 1980, which estimates a container storage capacity of 17,500 gallons and the closure plan which estimates a maximum capacity of 1000 drums (approximately 55,000 gallons)

DECONTAMINATING THE FACILITY

- ° Rationale for assuming container storage area will not need decontamination
- ° Procedures/parameters for decontaminating container storage area, if applicable (i.e., sand blasting, rinsings, testing rinse water, etc.)
- ° Methods, parameters and rationale for determining if soil contamination exist (i.e., soil samples test locations, depth) identify the areas with potential contamination and removal procedures, if applicable
- ° Procedures/parameters for decontamination of auxiliary equipment, if applicable.

COST ESTIMATE

Substantiation of closure cost estimate to ensure proper estimation. This estimate should include the following items which were omitted from the closure plan:

- ° Administrative cost, if applicable
- ° Contractor cost, if required
- ° Sampling, analysis, removal and disposal of contaminated soil, if applicable
- ° Auxiliary equipment, if applicable
- ° Disposal of contaminated rinse water
- ° Professional engineer's certification
- ° Contingency cost



Major

CPS CHEMICAL COMPANY, INC. P.O. BOX 162, OLD BRIDGE, N.J. 08857 • 201-727-3100

Subsidiaries: CPS CHEMICAL COMPANY • CPS CHEMICAL COMPANY OF ARKANSAS • CPS EXPORT, LTD. • CPS CHEMICALS CANADA

Telex 844532 • CPSOLDB

February 22, 1985

Mr. Conrad Simon, Director
Air & Waste Management Division
United States Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

Subject: Closure Plan and Costs per NJAC 7:26-9.8 and 9.10
in response to your letter of February 5, 1985

Dear Mr. Simon:

As requested by the subject letter and in accord with my phone conversation with Mr. Ton H. Moy of your staff on February 11, 1985, the subject closure plan and cost information is enclosed. Because we do not appear to fall under the categories covered by NJAC 7:26-9.9 and 9.11, this latter information has not been completed.

We have also signed and enclosed the Certification form, which was not received until February 19, 1985.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'J. A. Rowe, Jr.', is written over a horizontal line.

J. A. Rowe, Jr.

JAR/cy
Encl.

cc: Frank Coolick, NJDEP

FEB 19 1985

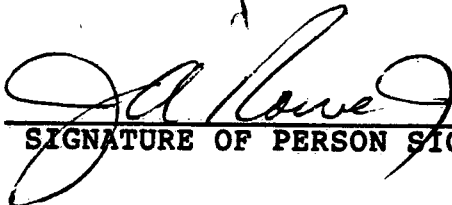
CERTIFICATION OF ANSWERS TO
REQUEST FOR INFORMATION

STATE OF NEW JERSEY)
COUNTY OF MIDDLESEX) ss.:

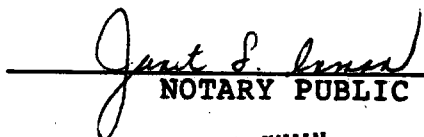
I certify that the foregoing answers to the EPA Request for Information are true, complete, and accurate to the best of my knowledge and belief and that any documents submitted herewith are complete and authentic to the best of my knowledge and belief.

J. A. ROWE, JR.
PRINTED NAME OF PERSON SIGNING

VICE PRESIDENT-OPERATIONS
TITLE


SIGNATURE OF PERSON SIGNING

Sworn to before me this 20th day
of February, 1985.


NOTARY PUBLIC

JANET L. HUMAN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Sept. 6, 1988

CPS CHEMICAL CO., INC.

NJAC 7:26-9.8 GENERAL CLOSURE REQUIREMENTS

Background Statement

The CPS Chemical Company is primarily a manufacturer of specialty organic chemicals used in water treatment. Some of the still residues generated in the manufacturing operation are hazardous wastes. CPS is a generator of hazardous wastes, primarily because these materials so generated are ignitable (D-001).

A secondary activity at CPS is the storage and recovery by distillation of certain solvents and chemicals, all of which have value, as is, and are further enhanced in value by such recovery. In each case the recovered, higher value material is returned to the customer and never discarded or treated as a waste.

CPS is not involved in the disposal of hazardous wastes at the Old Bridge site.

Hazardous wastes which are generated by the manufacturing processes are drummed as produced or stored in bulk tanks. These ignitable (D-001) wastes are stored in designated areas for subsequent off-site landfill disposal and/or incineration as waste fuel.

Closure of this part of the facility would occur only if the manufacture of products producing these wastes was discontinued. Closure then would consist of off-site landfill disposal of waste drums, and off-site incineration of bulk waste fuel followed by any necessary clean-up of the designated storage tanks and areas.

The recovery of solvents and chemicals at CPS utilizes excess distillation capacity not currently utilized for our manufacturing operations, which consist primarily of the production of water

treatment chemicals and intermediates. Closure of this part of the facility would result only in case of a decision by CPS management to utilize all existing capacity for captive production and to discontinue all recovery operations or if such recovery operations become uneconomical.

Closure in either case would consist of processing any remaining recovery materials or transfer of any remaining inventory to some alternate facility as directed by the supplier. All equipment and storage tanks would be decontaminated and cleaned to a condition suitable for other uses. The specific cleaning procedures will depend on the nature of the material last stored and will be developed as required. ✓ N.G.

RESPONSE TO SPECIFIC ITEMS IN NJAC 7:26-9.8

7:26-9.8

(e) 1. Closure Description

i. There is no intention, at the present time, to partially close the facility.

ii. As stated in the "Background Statement", the principal business of CPS Chemical is the manufacture of chemicals used for Water Treatment. There is no intention to close any portion of the Old Bridge operation at the present time.

2. Waste Inventory

Under normal operating conditions the drum waste for ultimate landfill disposal should not exceed 1,000 drums. It is our intention to gradually reduce this total by converting an increasingly higher percentage of ignitable waste to bulk liquids for incineration. This bulk liquid for incineration should not

exceed 30,000 gallons at any one time and will normally be less than 20,000 gallons.

3. Decontamination Steps

a. Drums. Full drums of solid non-pumpable waste will be landfilled. Drums containing pumpable liquid, if any, will be dedrugged into bulk tanks for incineration. Empty drums, if any, will be decontaminated by authorized rinsing procedures and salvaged as scrap steel. No decontamination of the drum storage area surface should be required.

b. Bulk Liquids. Ignitable waste tanks will be emptied by transferring the contents to designated approved incineration facilities. All such tanks will be solvent rinsed and the solvent made a portion of the bulk incineration load. Trace solvent remaining will be removed by steam cleaning until the tanks are rendered non-hazardous.

All other bulk tanks or processing equipment containing recovery crudes will be emptied by returning the contents to suppliers or to such other facilities as may be designated by the suppliers. Final decontamination will result from steam cleaning each item of bulk storage or processing equipment in accord with approved procedures.

4. Final Closure Schedule/Milestone Dates

If at some future time a decision is made to close the facility, the following plan, with milestone target dates would be anticipated.

a. Start (day zero). Discontinue processing operations including receipt of all raw materials and crudes being subjected to recovery process to enhance value.

b. Drum disposition (per below, 42 days maximum).

(1) Maximum twelve (12) truckloads of solid residues at 2 truckloads per week. Total time 6 weeks or 42 days.

(2) Simultaneous dedrumming of pumpable liquids to bulk storage and decontamination of empty drums. Not to exceed 30 days within above 42 day period.

(3) Removal of all decontaminated drums to scrap steel yard. Not to exceed 30 days within above 42 day period.

c. Bulk Tank/Bulk Processing Equipment (49 days maximum).

(1) Simultaneous emptying of five (5) tanks containing a maximum of 30,000 gallons (6 x 5,000 gallon tank wagons) of waste fuel for incineration at a rate of two (2) tank wagons per week. Total three (3) weeks or 21 days.

(2) Simultaneous return to customers or alternate recovery facility of approximately nine (9) tanks containing a maximum of 105,000 gallons of recovery crudes for value enhancement. Estimate three (3) 5,000 gallon tank wagons per week, or a maximum of seven (7) weeks (49 total days simultaneous with drum removal).

(3) Processing equipment will be empty and non-operational during the drum and bulk tank emptying operation.

d. Decontamination of Bulk Storage and Bulk Processing Equipment (42 additional days).

Steam and/or solvent cleaning and related decontamination of all processing and storage equipment will commence as each piece of equipment is emptied. There is no reason to believe that this final cleaning procedure will consume more than an additional six (6) weeks (42 days) beyond the final removal of bulk liquids.

Thus the total final closure should be accomplished in a maximum of thirteen (13) weeks or 91 days from the start. In summary the milestones are:

42 days. Complete all drum removal.

49 total days. Complete all drum and bulk liquid removal

91 total days. Complete all decontamination of drum and bulk liquid storage areas and all bulk and processing equipment.

7:26-9.10 FACILITY CLOSURE FINANCIAL REQUIREMENTS

(e) Closure Cost Estimates

1. Current Estimate (2/22/85) - Maximum

a. Landfill Charges:

1,000 drums @ \$50.00/drum 50,000.00

Alabama State Tax \$2.00/drum 2,000.00

Freight \$2,200/load for 12 loads 26,400.00

Total landfill charges \$78,400.00 ✓

b. Bulk Liquid Incineration Charges:

30,000 gallons waste fuel @ \$0.25/gal. \$ 7,500.00

c. Storage Tank/Processing Equipment
Cleaning and Disposal:

Total fourteen (14) storage tanks, six (6)
processing vessels and auxiliary receivers.

Total estimated cost for solvent and/or
steam cleaning and removal of
solvent (estimate) \$10,000.00

d. Freight to Return Recovery Crudes
to Source or to Alternate Recovery
Facility:

Twenty-one (21) 5,000 gallon tank
wagons at estimated average freight
charges of \$500.00 each \$10,500.00

Total closure cost (estimate) \$106,400.00

7:26-9.10 (f) FINANCIAL CLOSURE ASSURANCE

CPS Chemical has in effect, currently, a Surety Bond No. 80 98 77 32 from the Chubb Group of Insurance Companies. This Bond expires on February 26, 1985.

In the process of updating our Closure Cost information, we discussed the various financial assurance options available with Mr. Ali Chaudry of Mr. Frank Coolick's staff at the NJDEP Bureau of Hazardous Waste Engineering. As a result of that discussion, our assurance, effective February 26, 1985, will be a Trust Fund set up by National State Bank of Elizabeth, New Jersey.

13 JUN 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John A. Rowe
Operations Manager
CB Chemical Company, Inc.
P.O. Box 182
Old Bridge, New Jersey 08857

Dear Mr. Rowe:

The U.S. Environmental Protection Agency (EPA) is charged with the responsibility for implementing the Solid Waste Disposal Act, as amended, 42 U.S.C. §6901 et seq. (the Act). [Note: Among the statutes amending the Act is the Resource Conservation and Recovery Act (RCRA), 90 Stat. 2795, P.L. 95-606 (1978).] By notification, you informed EPA that you conduct activities at the above referenced facility involving "hazardous waste," as that term is defined in Section 1004(5) of the Act, 42 U.S.C. §6904(5), and in 40 CFR 301. As is required in Section 3003 of the Act, 42 U.S.C. §6923, and in 40 CFR 327b, you requested a permit to conduct such hazardous waste activities.

Section 3004(6) of the Act, 42 U.S.C. §6924(6), provides that the Administrator of EPA may, if certain criteria are met, authorize a State to operate a hazardous waste program in lieu of the Federal program. The Administrator authorized the State of New Jersey to operate a program in lieu of the Federal program as of February 2, 1983.

Section 3005 of the Act, 42 U.S.C. §6925, authorizes EPA to enforce the provisions of the authorized State program.

In accordance with EPA's responsibility, a review of the required closure plan and cost estimate for the subject facility has been performed. EPA has determined that, based on the above referenced review, your facility is in violation of the New Jersey Solid Waste Management Act, N.J.S.A. 13:27 et seq., and the regulations promulgated thereunder. The following paragraphs indicate the regulatory provisions that have been violated:

N.J.A.C. 7:26-9.8 requires that the owner or operator of a hazardous waste facility must develop and maintain at the facility, a written closure plan which describes the steps necessary to close all or part of the facility. At the time of the review, the documents submitted are insufficient to meet the requirements of this section. A description of the deficiencies is enclosed. You are therefore in violation of N.J.A.C. 7:26-9.8.

2AWM-SW:TSOLECKI:mb: 5/22/85: Retyped: 6/22/85

N.J.A.C. 7:26-9.10 requires that the owner or operator of a hazardous waste facility must have at the facility a written estimate of the costs of closing the facility. At the time of the review, the documents submitted are insufficient to meet the requirements of this section. A description of the deficiencies is enclosed. You are therefore in violation of N.J.A.C. 7:26-9.10.

Section 3008 of the Act authorizes the assessment of a civil penalty of up to \$25,000 per day for violations of statutory provisions or relevant regulations. The determination of whether a penalty is to be imposed is based upon various factors, including the nature and seriousness of the violation and the good faith efforts to comply with the applicable requirements. It has been determined in this case that no penalty will be imposed for the violations cited above if the facility corrects all violations cited herein as expeditiously as possible and in no case later than 30 days from the receipt of this letter. Should the cited violations be discovered at this facility in the future, it is likely that an action for the assessment of a civil penalty will be initiated. Furthermore, please be advised that this letter in no way precludes future enforcement actions for any other violations discovered as a result of any other inspection.

Enclosed you will find a listing of additional information required to ensure proper closure and compliance with N.J.A.C. 7:26-9.8 and 7:26-9.10. Please submit, within 30 days of your receipt of this letter, a revised closure plan and any necessary support documents. This documentation should be addressed to:

Mr. Richard M. Walka
Chief, Solid Waste Branch
Air & Waste Management Division
26 Federal Plaza
New York, New York 10278

Also, please send a copy of this documentation to Richard A. Baker, Chief, Permits Administration Branch, at the same address. You must include your EPA identification number on all correspondence.

Should you have any questions about this notice or should you wish to discuss this matter further, please contact Thomas Solecki of my staff, at 212/264-5130.

Sincerely yours,

Richard M. Walka
Chief
Solid Waste Branch

Enclosure

cc: Joseph Rogalski, Assistant Director of Field Operations
Division of Waste Management, NJDEP (w/encl.)

bcc: Tom Solecki, SWB
Stanley Siegel, SWB
Richard Baker, PAR
Tom May, SWB

CPS CHEMICAL COMPANY, INC.
EPA I.D. NO. NJD002141190

The following deficiencies and/or omissions have been noted in CPS Chemical Company, Inc.'s closure plan and closure cost estimate dated February 22, 1985:

FACILITY DESCRIPTION

- Description of container storage area including size, location and supporting surface material
- Description of tanks used for storage of hazardous waste including number, location (above or below ground) and capacity of each tank
- Certification of closure
- Estimate of the year of closure
- Inventory of auxiliary equipment

REMOVING ALL INVENTORY/WASTE

- Estimate of the amount of contaminated soil, if applicable
- Estimate of the amount of contaminated rinse water
- Container storage - Resolve discrepancy between Part A filed November 11, 1980, which estimates a container storage capacity of 17,500 gallons and the closure plan which estimates a maximum capacity of 1000 drums (approximately 55,000 gallons)

DECONTAMINATING THE FACILITY

- Rationale for assuming container storage area will not need decontamination
- Procedures/parameters for decontaminating container storage area, if applicable (i.e., sand blasting, rinsings, testing rinse water, etc.)
- Methods, parameters and rationale for determining if soil contamination exist (i.e., soil samples test locations, depth) identify the areas with potential contamination and removal procedures, if applicable
- Procedures/parameters for decontamination of auxiliary equipment, if applicable.

COST ESTIMATE

Substantiation of closure cost estimate to ensure proper estimation. This estimate should include the following items which were omitted from the closure plan:

- Administrative cost, if applicable
- Contractor cost, if required
- Sampling, analysis, removal and disposal of contaminated soil, if applicable
- Auxiliary equipment, if applicable
- Disposal of contaminated rinse water
- Professional engineer's certification
- Contingency cost

SEP 30 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John A. Rowe
Operations Manager
CPS Chemical Company, Inc.
P.O. Box 162
Old Bridge, New Jersey 08857

Re: Revised Closure Plan/Cost Estimate dated July 16, 1985
EPA I.D. No. NJD002141190

Dear Mr. Rowe:

In accordance with the U.S. Environmental Protection Agency's (EPA) responsibility, as stipulated in Section 3007 of the Act, 42 U.S.C. §6927, EPA has received and reviewed your revised closure plan and cost estimate dated July 16, 1985, which was submitted in response to our warning letter of June 12, 1985 and found information missing in the following areas:

- Soil testing methods, parameters and rationale for determining if soil contamination exist (i.e., soil sample test locations, depths, etc.). Soil testing will be required at closure in the container storage area due to its location.
- Resolve discrepancy between revised Part A which indicates tank storage (SO2) 152,500 gallons and submittal of July 16, 1985 which indicates storage capacity of approximately 137,000 gallons. In addition, specify type waste stored in each tank.
- Revised closure cost estimate to include the above two deficiencies.

CPS Chemical Company, Inc., is required to submit, within 30 days of receipt of this letter, all documents so as to meet the requirements of the aforementioned warning letter. These documents should be sent to:

Mr. Stanley Siegel, Acting Chief
New Jersey/Caribbean Compliance & Enforcement Section
Air & Waste Management Division
U.S. Environmental Protection Agency
26 Federal Plaza, Room 1043
New York, New York 10278

Should you have any questions about this notice or should you wish to discuss this matter further, please contact Thomas Solecki of my staff, at 212/764-5130.

Sincerely yours,

Stanley Siegel, Acting Chief
New Jersey/Caribbean Compliance & Enforcement Section

cc: Frank Coolick, Chief
Bureau of Hazardous Waste, NJDEP

John H. Skowiak, Assistant Chief
Compliance & Enforcement, NJDEP

bcc: Tom Solecki, SWB
Laura Livingston, PAB

Stan
Tom

22 JUN 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John A. Rowe
Operations Manager
CPS Chemical Company, Inc.
P.O. Box 162
Old Bridge, New Jersey 08857

Dear Mr. Rowe:

The U.S. Environmental Protection Agency (EPA) is charged with the responsibility for implementing the Solid Waste Disposal Act, as amended, 42 U.S.C. §6901 et seq. (the Act). [Note: Among the statutes amending the Act is the Resource Conservation and Recovery Act (RCRA), 90 Stat. 2793, P.L. 94-520 (1976).] By notification, you informed EPA that you conduct activities at the above referenced facility involving "hazardous waste," as that term is defined in Section 1004(5) of the Act, 42 U.S.C. §6904(5), and in 40 CFR §261. As is required in Section 3005 of the Act, 42 U.S.C. §6925, and in 40 CFR §270, you requested a permit to conduct such hazardous waste activities.

Section 3006(6) of the Act, 42 U.S.C. §6926(6), provides that the Administrator of EPA may, if certain criteria are met, authorize a State to operate a hazardous waste program in lieu of the Federal program. The Administrator authorized the State of New Jersey to operate a program in lieu of the Federal program as of February 2, 1983.

Section 3008 of the Act, 42 U.S.C. §6928, authorizes EPA to enforce the provisions of the authorized State program.

In accordance with EPA's responsibility, a review of the required closure plan and cost estimate for the subject facility has been performed. EPA has determined that, based on the above referenced review, your facility is in violation of the New Jersey Solid Waste Management Act, N.J.S.A. 13:1E et seq., and the regulations promulgated thereunder. The following paragraphs indicate the regulatory provisions that have been violated:

N.J.A.C. 7:26-9.8 requires that the owner or operator of a hazardous waste facility must develop and maintain at the facility, a written closure plan which describes the steps necessary to close all or part of the facility. At the time of the review, the documents submitted are insufficient to meet the requirements of this section. A description of the deficiencies is enclosed. You are therefore in violation of N.J.A.C. 7:26-9.8.

N.J.A.C. 7:26-9.10 requires that the owner or operator of a hazardous waste facility must have at the facility a written estimate of the costs of closing the facility. At the time of the review, the documents submitted are insufficient to meet the requirements of this section. A description of the deficiencies is enclosed. You are therefore in violation of N.J.A.C. 7:26-9.10.

Section 3008 of the Act authorizes the assessment of a civil penalty of up to \$25,000 per day for violations of statutory provisions or relevant regulations. The determination of whether a penalty is to be imposed is based upon various factors, including the nature and seriousness of the violation and the good faith efforts to comply with the applicable requirements. It has been determined in this case that no penalty will be imposed for the violations cited above if the facility corrects all violations cited herein as expeditiously as possible and in no case later than 30 days from the receipt of this letter. Should the cited violations be discovered at this facility in the future, it is likely that an action for the assessment of a civil penalty will be initiated. Furthermore, please be advised that this letter in no way precludes future enforcement actions for any other violations discovered as a result of any other inspection.

Enclosed you will find a listing of additional information required to ensure proper closure and compliance with N.J.A.C. 7:26-9.8 and 7:26-9.10. Please submit, within 30 days of your receipt of this letter, a revised closure plan and any necessary support documents. This documentation should be addressed to:

Mr. Richard M. Walka
Chief, Solid Waste Branch
Air & Waste Management Division
26 Federal Plaza
New York, New York 10278

Also, please send a copy of this documentation to Richard A. Baker, Chief, Permits Administration Branch, at the same address. You must include your EPA identification number on all correspondence.

Should you have any questions about this notice or should you wish to discuss this matter further, please contact Thomas Solecki of my staff, at 212/264-5130.

Sincerely yours,

Richard M. Walka
Chief
Solid Waste Branch

Enclosure

cc: Joseph Rogalski, Assistant Director of Field Operations
Division of Waste Management, NJDEP (w/attl.)

cc: Tom Solecki, Chief
Stanley H. Hines, Jr.
Richard A. Baker, Chief
EN/DOA/DOH

CPS CHEMICAL COMPANY, INC.
EPA I.D. NO. NJD002141190

The following deficiencies and/or omissions have been noted in CPS Chemical Company, Inc.'s closure plan and closure cost estimate dated February 22, 1985:

FACILITY DESCRIPTION

- ° Description of container storage area including size, location, and supporting surface material ✓
- ° Description of tanks used for storage of hazardous waste including number, location (above or below ground) and capacity of each tank
- ° Certification of closure
- ° Estimate of the year of closure
- ° Inventory of auxiliary equipment

REMOVING ALL INVENTORY/WASTE

- ° Estimate of the amount of contaminated soil, if applicable
- ° Estimate of the amount of contaminated rinse water
- ° Container storage - Resolve discrepancy between Part A filed November 11, 1980, which estimates a container storage capacity of 17,500 gallons and the closure plan which estimates a maximum capacity of 1000 drums (approximately 55,000 gallons)

DECONTAMINATING THE FACILITY

- ° Rationale for assuming container storage area will not need decontamination
- ° Procedures/parameters for decontaminating container storage area, if applicable (i.e., sand blasting, rinsings, testing rinse water, etc.)
- ° Methods, parameters and rationale for determining if soil contamination exist (i.e., soil samples test locations, depth) identify the areas with potential contamination and removal procedures, if applicable
- ° Procedures/parameters for decontamination of auxiliary equipment, if applicable.

COST ESTIMATE

Substantiation of closure cost estimate to ensure proper estimation. This estimate should include the following items which were omitted from the closure plan:

- ° Administrative cost, if applicable
- ° Contractor cost, if required
- ° Sampling, analysis, removal and disposal of contaminated soil, if applicable
- ° Auxiliary equipment, if applicable
- ° Disposal of contaminated rinse water
- ° Professional engineer's certification
- ° Contingency cost